## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

BOBBY HEARNS,		)	
	Plaintiff,	)	NO. 08 C 1393
v.		)	JUDGE DARRAH
CITY OF CHICAGO, ILLINOIS, and CHICAGO POLICE OFFICER		) )	MAGISTRATE JUDGE KEYS
J.F. SIKORSKI, Star No. 11143, and CHICAGO POLICE OFFICER		)	
E. GONZALEZ, Star No. 9627,		)	
	Defendants.	)	

## CITY OF CHICAGO'S AGREED MOTION TO EXTEND THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD

Defendant, the City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel, respectfully asks this Honorable Court for an extension of time up to and including June 5, 2008, in which to answer or otherwise plead to Plaintiff's Complaint.

In support of this motion, Defendant states:

- This matter was filed on March 7, 2008, in the United States District Court,
   Northern District of Illinois. ACC Rita Moran was assigned the case on behalf of the City on May 5, 2008.
- 2. The undersigned has not yet received any of the Chicago Police Department records to enable Defendant to properly respond to Plaintiff's Complaint.
- 3. This motion is Defendant's first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

4. Plaintiff's counsel was informed of this motion on May 5, 2008, and agrees with its terms.

**WHEREFORE**, Defendant, City, respectfully asks for an order extending the time to answer or otherwise plead to June 5, 2008.

Respectfully Submitted,

MARA S. GEORGES CORPORATION COUNSEL

BY: /s/ Rita Moran

RITA MORAN Assistant Corporation Counsel Attorney for Defendant City

30 N. LaSalle Street Suite 1020 Chicago, IL 60602 (312) 744-4939 Attorney No. 06270301

## **CERTIFICATE OF SERVICE**

I, Rita Moran, an attorney, hereby certify that I have caused true and correct copies of the
above and foregoing Motion and Notice of Motion to be served upon all parties of record
pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 5th day of
May, 2008.

/s/ Rita Moran RITA MORAN